

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BRIDGESTONE SPORTS CO., LTD, and)	
BRIDGESTONE GOLF, INC.,)	
)	
Plaintiffs,)	
)	
v.)	
)	
ACUSHNET COMPANY,)	C. A. No. 05-132 (JJF)
)	
Defendant.)	
)	
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ACUSHNET COMPANY,)	
)	
Counterclaim Plaintiff,)	
)	
v.)	
)	
BRIDGESTONE SPORTS CO., LTD, and)	
BRIDGESTONE GOLF, INC.,)	
)	
Counterclaim Defendant.)	

**DECLARATION OF DAVID E. MOORE IN SUPPORT OF
ACUSHNET'S MOTION FOR REPRESENTATIVE CLAIMS AND
TO REQUIRE DETAILED INFRINGEMENT CONTENTIONS**

I, David E. Moore, declare as follows:

1. I am an attorney employed by the law firm of Potter Anderson and Corroon LLP, counsel of record for Acushnet Company. I make this declaration of my own personal knowledge and would testify to the matters set forth below if called upon to do so.
2. Attached to this document are various excerpts of litigation documents and exhibits. The complaints, answers, and responses to interrogatories and other documents relevant to this motion are voluminous. I believe that in most instances only selected excerpts of the documents are relevant to this motion, and that because the full documents have already been exchanged, there is no good cause to attach them in their

entireties for purposes of this motion. It is my intent, however, as Acushnet's attorney, to offer into evidence the entire documents of which excerpts are attached to this declaration or declaration of other witnesses. Acushnet will submit the entire document to the Court, if requested by the Court or Bridgestone, at or before the hearing of this motion.

3. Attached hereto as Exhibit 1 are true and correct copies of relevant pages from Bridgestone Sports Co.'s Complaint for Patent Infringement, filed on July 24, 2000 in the matter *Bridgestone Sports Co., Ltd. v. Callaway Golf Co.*, No. 00-CV-1871 (N.D.Ga.).

4. Attached hereto as Exhibit 2 are true and correct copies of relevant pages from the Plaintiff's Response to Defendant's First Set of Interrogatories, dated July 11, 2005 (D.I. 20).

5. Attached hereto as Exhibit 3 are true and correct copies of relevant pages from the Transcript of Oral Argument held Oct. 5, 2005.

6. Attached hereto as Exhibit 4 is *Fenster Family Patent Holdings, Inc. v. Elscint, Ltd.*, C.A. No. 04-0038, 2005 WL 2304190 (D.Del. Sept. 20, 2005).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this Declaration was executed this 2nd day of December, 2005 in Wilmington, Delaware.

/s/ David E. Moore

David E. Moore

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CERTIFICATE OF SERVICE

I, David E. Moore, hereby certify that on December 2, 2005, the attached document was hand delivered to the following persons and was electronically filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following and the document is available for viewing and downloading from CM/ECF.

Jack B. Blumenfeld
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I hereby certify that on December 2, 2005, I have Federal Expressed the documents to the following non-registered participants:

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/s/ David E. Moore

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